

ERIC HEIMANN  
Acting United States Attorney  
C. LEVI MARTIN (WY Bar #6-3781)  
Assistant United States Attorney  
P.O. Box 668  
Cheyenne, WY 82003-0668  
Tel: 307-772-2124  
[christopher.martin@usdoj.gov](mailto:christopher.martin@usdoj.gov)

TODD KIM  
Assistant Attorney General  
Environment & Natural Resources Division  
LUTHER L. HAJEK  
United States Department of Justice  
999 18<sup>th</sup> St.  
South Terrace – Suite 370  
Denver, CO 80202  
Tel: 303-844-1376 / Fax: 303-844-1350  
[luke.hajek@usdoj.gov](mailto:luke.hajek@usdoj.gov)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

AMERICAN FARM BUREAU  
FEDERATION, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE  
INTERIOR, *et al.*,

Defendants.

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) Case No. 1:24-cv-136-ABJ  
) Honorable Alan B. Johnson  
)

) **DEFENDANTS' UNOPPOSED**  
) **MOTION TO TRANSFER**  
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Defendants the U.S. Department of the Interior *et al.* respectfully move pursuant to 28 U.S.C. § 1404(a) to transfer this case to the U.S. District Court for the District of Utah. This is the third of four cases challenging the U.S. Bureau of Land Management’s (“BLM”) issuance of the Conservation and Landscape Health Final Rule, 89 Fed. Reg. 40,308 (May 9, 2024) (the “Rule” or “Public Lands Rule”). At the time this case was filed, multiple states, including the State of Wyoming, filed suits in other venues, namely, the District of Utah and the District of North Dakota. Subsequently, the State of Alaska filed suit in the District of Alaska. Transferring this case to the District of Utah serves the interest of justice by promoting judicial economy and avoiding the potential for conflicting judgments. The motion should be granted for all of the grounds set forth in Defendants’ accompanying memorandum of points and authorities in support of the motion.

Defendants’ counsel has conferred with Plaintiffs’ counsel regarding this motion, and Plaintiffs do not oppose this motion and consent to the transfer of this case to the District of Utah so that it may be consolidated (either formally or informally) with the pending case filed by the States of Utah and Wyoming. Defendants and Plaintiffs request that this motion be resolved expeditiously so that this case may be heard on the same schedule as the case filed by Utah and Wyoming. In that case, Defendants anticipate that the case will proceed to merits briefing after the administrative record is filed in mid-October. Plaintiffs intend to file a short response to this motion memorializing their reasons for consenting to the requested transfer of the case to the District of Utah.

Respectfully submitted this 5th day of September 2024,

ERIC HEIMANN  
United States Attorney  
C. LEVI MARTIN (WY Bar #6-3781)  
Assistant United States Attorney  
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Cheyenne, WY 82003-0668  
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*Attorneys for Defendants*